

**IN THE CIRCUIT COURT  
OF JACKSON COUNTY, MISSOURI  
AT INDEPENDENCE**

Police# 13-052867  
Prosecutor# 095437283  
1716-CR  
OCN# an015038

Amended  
**COMPLAINT**

**STATE OF MISSOURI**

**vs.**

**John D. Seger  
4420 St. John  
Kansas City, MO 64123  
DOB: 06/03/1992; Race/Sex: W/M;  
SS# [REDACTED]  
Defendant.**

**Count I. Murder 2nd Degree (565.021-001Y19840999.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.021, RSMo, committed the class A felony of murder in the second degree, punishable upon conviction under Section 558.011, RSMo, in that on or about July 27, 2013, in the County of Jackson, State of Missouri, the defendant knowingly or with the purpose of causing serious physical injury to Corey Laykovich caused the death of Corey Laykovich by stabbing him.

An individual convicted and sentenced for this offense shall not be eligible for parole until eighty-five percent of the sentence is served.

The range of punishment for a class A felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than ten (10) years and not to exceed thirty (30) years, or life imprisonment.

The facts that form the basis for this information and belief are contained in the attached statement(s) of facts, made a part hereof and submitted as a basis upon which this court may find the existence of probable cause.

Wherefore, the Prosecuting Attorney prays that an arrest warrant be issued as provided by law.

**THE STATE OF MISSOURI**

vs.

**John D. Seger**

**JEAN PETERS BAKER**  
Prosecuting Attorney  
Jackson County, Missouri  
by,



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Michael J. Hunt (#34818)  
Assistant Prosecuting Attorney  
321 W. Lexington  
Independence, Missouri 64050  
(816) 881-3856  
mhunt@jacksongov.org

**WITNESSES:**

PO Justin English , 223 N. Memorial Drive, Independence, MO 64050

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PO Lewis Logan , 223 N. Memorial Drive, Independence, MO 64050

CST Brent McHenry , 223 N. Memorial Drive, Independence, MO 64050

CST Kevin Phillips , 223 N. Memorial Drive, Independence, MO 64050

DET John Roach , 223 N. Memorial Drive, Independence, MO 64050

CST Linda Rosewaren , 223 N. Memorial Drive, Independence, MO 64050

## PROBABLE CAUSE STATEMENT

Date: 1/19/2017

Report #: 13-52867

**I, John Roach, a Detective with the Independence, Missouri, Police Department, knowing that false statements on this form are punishable by law, state that the facts contained herein are true.**

1. I have probable cause to believe that on 07-27-13, at, John D. Seger, (Race: White, Sex: Male, DOB: 06-03-1992, Address: 4420 St. John, Kansas City Missouri, 64123, SSN: [REDACTED]) committed one or more criminal offenses in Jackson County, Missouri.
2. The facts supporting this belief are as follows:

On 07-27-2013 at 0221 hours, Officers with the Independence Police Department were dispatched to 4008 S. Crackerneck in reference to a subject being found at the residence with a stab wound.

Upon arrival Officer Logan made contact with Justin Laykovich who advised that his brother; Corey Laykovich, was inside the residence and had been stabbed. Officer Logan responded inside the residence to an upstairs bedroom where he observed Corey being treated by AMR personnel. He observed that Corey had a large laceration on the right side of his neck and what appeared to be a stab wound on his lower right abdomen. Corey was unresponsive and unable to provide Officers with a statement. At that point Corey was transported to Centerpoint Medical Center for treatment.

Detective Roach with the Independence Police Department responded to Centerpoint and made contact with Justin, his mother; Michelle Metje, and his step-father; Bob Norris. Michelle advised that she and Bob last saw Corey around 1800 hours on 07-26-13 when they left for dinner. She advised that when they got home Corey and his vehicle were gone.

Justin stated that he left the residence a little after midnight to go for a walk and that is when he found Corey's car parked in front of the house. He advised that it is not unusual for Corey to park his car and walk to a friend's house after he has been drinking. Justin advised that he finished his walk and went back inside and went to bed.

Justin advised that a few hours later he heard Corey come in the back door and stumble down the hallway and go into his bedroom. He advised that Corey has done this in the past and it was not unusual. Justin advised that he had heard Corey breathing heavily and was concerned about his welfare and decided to check on Corey.

Justin advised that when he went into Corey's room he found Corey sitting up in bed and he was bleeding from the neck. He advised that he tried to ask Corey what happened but Corey was unresponsive. Justin advised that he went and woke Michelle up and she called 911.

While conducting the investigation at the house blood was found on the outside gate on the north side of the residence and on the outside of the backdoor. It was determined that Corey had been stabbed at an unknown location and had walked home.

It was found that Corey had spent the previous evening in the company of three juveniles [REDACTED] (10-29-1996, 16 YOA at the time of the incident), [REDACTED] (04-23-1998, 15 YOA at the time of the incident), and [REDACTED] (12-16-1998, 15 YOA at the time of the incident). All three juveniles had spent the night together at 4005 S. Redwood Drive apartment C.

[REDACTED], [REDACTED], and [REDACTED] were all interviewed in regards to their interaction with Corey the previous evening. Through the investigation it was found that they had met up with Corey around 1900 hours on 07-26-13. They stated that Corey picked them up in his car and they went to the Independence Center (18801 E. 39<sup>th</sup> Street) until approximately 2100 hours, the old AMF Bowling building (3701 S. Ponca) until approximately 2200 hours, Walmart (4000 S. Bolger) until approximately 2315 hours, Quik Trip (17815 E. 39<sup>th</sup> Street) until approximately 2330 hours, William Yates Elementary School (3600 S. Davison) until approximately 2345 hours, and they finished the evening at "the carport" which is located on the northeast property of Redwood Apartments (3926 S. Redwood). All the locations that Corey and the juveniles are within close proximity to one another.

[REDACTED], [REDACTED], and [REDACTED] advised that when they returned to "the carport" they drank alcoholic beverages with Corey for a few minutes then returned to 4005 S. Redwood apartment C. They advised that they left Corey at "the carport" around 0005 hours. They advised that when they left Corey he was talking on the phone with [REDACTED], [REDACTED], a mutual friend.

[REDACTED] was contacted via phone and found to be living in Deepwater Missouri. She advised that she had talked to Corey on the phone until approximately 0030 hours. Cell phone records show that she talked to Corey until 0036 hours. [REDACTED] advised that when she was on the phone with Corey it sounded like he was walking through woods. She advised that he told her that he was walking to Quik Trip to purchase more alcohol. [REDACTED] advised that Corey was alone when he was talking to her on the phone.

It was determined through the investigation that Corey's location and who he was with could not be determined from 0036 hours and approximately 0210 hours. Corey's cell phone was seized and it was later discovered through GPS tracking that Corey's phone did not leave that area.

On 07-27-13 at 1000 hours Detective's Burris and Roach conducted a neighborhood canvass around 4008 S. Crackerneck. Detective Burris made contact with [REDACTED] at 4 [REDACTED] S. Crackerneck. He advised that he sleeps with his windows open and that between 0130 and 0200 hours he heard screaming and yelling. [REDACTED] advised that when he looked out the window he observed two people near the apartment building of [REDACTED] Crackerneck. He advised that he could not make out a gender on the two subjects but that they were both screaming and yelling.

Contact was made with [REDACTED], [REDACTED] who lives at [REDACTED] apartment [REDACTED]. He advised that he sleeps with his balcony door open and that around 0200 hours he heard a short scream coming from the east of his apartment. He could not provide any further information.

Detective Burris and Roach checked around the dumpster and the picnic area which is at that southeast end of Redwood Apartments. This was the area that both parties indicated they heard the screams coming from. No evidence was found.

On 07-29-13 Detective Bosch made contact with Centerpoint Hospital to check on the status of Corey. He was advised that Corey had been pronounced brain dead and that he would be removed from life support later in the evening.

As the investigation progressed and no viable leads or information produced a suspect in the case, Michelle and Ashley Laykovich, Corey's wife, discussed who might want to hurt Corey. Ashley advised Michelle that Defendant Seger is a prior associate of Corey's who has a violent personality, a drug user, and has a long standing "feud" with Corey.

Based on the information provided by Ashley an order authorizing historical call site information for two phone numbers associated to Defendant Seger was obtained. Data gained from the cell phone order did not provide enough probable cause for Detective Roach to issue of Person of Interest Order for Defendant Seger.

On 01-18-16 Defendant Seger was arrested by the Independence Police Department for his involvement in a vehicle pursuit and unlawful possession of a firearm. He was escorted to a 3<sup>rd</sup> Floor Interview room where he was read and signed the Miranda Warning of Rights form. After Defendant Seger was interviewed by Detective English in regards to the charges, Detective Roach interviewed Defendant Seger in regards to his relationship with Corey.

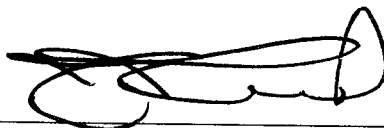
When I informed Defendant Seger that I wanted to talk to him about the Corey Laykovich case he advised me that he knew exactly who I was talking about. Defendant Seger admitted that he had been neighbors with Corey in the past and that they were friends. Defendant Seger went on to admit that the last time he saw Corey was on the night that Corey was killed. He stated that he was walking late at night and he Corey crossed paths as Corey was walking back to his mom's house. Defendant Seger stated that he and Corey sat at a picnic table by some apartments in a "grassy area" and talked for a while.

As the interview progressed Defendant Seger admitted that he and Corey had gotten into a heated argument over Defendant Seger "talking" to Ashley. Defendant Seger stated that as the argument progressed Corey pulled a knife on him and attempted to stab him. Defendant Seger stated that as Corey attempted to stab him, he got Corey in a wrist lock and had Corey's arm pinned behind his neck. He stated that was what caused the knife wound to the back of Corey's neck. Defendant Seger stated that he took the knife away from Corey and that the two of them continued to fight. He said that during the fight he and Corey fell to the ground and that is how Corey was stabbed in the abdomen.

Defendant Seger stated that after Corey had been stabbed he got the "deer in headlights" feeling and ran from the scene. He advised that he still had the knife with him when he fled the scene on foot and threw the knife somewhere in the woods. Defendant Seger advised that he ran to a friend's house at Sommerset Apartments where he slept for two days.

Defendant Seger admitted that Corey had been killed as result of his actions and that he was sorry for what he had done. He further advised that the stab wounds had not been "malicious".

Detective John Roach



#1179

\_\_\_\_\_  
Print Name

\_\_\_\_\_  
Signature

THE COURT FINDS PROBABLE CAUSE:

\_\_\_\_\_  
Date

\_\_\_\_\_  
Judge